

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket No. 99-23
Table of Allotments)
FM Broadcast Stations) RM-9423
(Tipton, OK))

To: Chief, Allocation Branch
Policy and Rules Division
Mass Media Bureau

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JUN 10 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY TO "ESSENTIAL SUPPLEMENTAL COMMENTS"

I am Ellinor Nelson. I am the founder and presently the only member of Good Government Radio (GGR). I am responding to the comments filed by Texas Grace Communications (Texas grace) filed on May 26, 1999. I speak specifically of the GGR desire to operate a 50,000 watt FM station licensed to Tipton, Oklahoma. In order to be succinct, I will make brief statements concerning the document filed by Texas Grace Communications.

1. I filed a petition for rule making at Tipton because I want to operate a commercial FM radio station at that community.
2. I know nothing about Archer City, Texas, Texas Grace Communications, Dave Garey, or his plans for KRZB. I retained Paul Reynolds to find a channel for Tipton. I am not aware of any plan by Reynolds, or any of his other clients and/or their associates, to use this channel to pressure, block or deter Dave Garey with his station.

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3. I have never met or talked with anyone associated with WBAP/KSCS - Blue Bonnet Radio. I know nothing of their plans for changing their stations or how those plans may affect my request at Tipton, other than Reynolds informed me that he had conflict with the proposed channel at Tipton.
4. I have never met, or heard of Jim Stansell or anyone related to the ownership of KLAK radio. I am not aware of any of their plans for that station.
5. I have heard of Mark Lipp in conversations with Reynolds, but I have never spoken or corresponded with him. He had nothing to do with filing of my Tipton petition.
6. When I decided to start GGR, I chose Gonzalez, Florida, as my base of business operation. The reason for this choice is purely a business decision which has no bearing on the conflict in question.
7. I requested Reynolds to open the mailbox at Gonzalez for me. I was not aware of his misunderstanding of a statement on the application and that he checked "no" to a question on the application based on information given him by a postal employee. I did not instruct him to conceal my involvement with the Gonzalez mailbox.
8. There was never any thought of hiding my (GGR) involvement with Reynolds in filing the Tipton petition. I am amazed at the furor created by Texas Grace over this matter. If I had any idea that the post office box at Gonzalez could have been misconstrued to such a major ordeal, I would have opened it myself.

9. I highly resent my statements in my Reply Comments being misquoted concerning my desire to be non-profit versus non-commercial. Texas Grace has completely taken my statement out of context when I said that I wanted to operate the station "not for profit." I never said I wanted a non-commercial station, I said I would operate it not for profit. I fully intend to rely on commercial revenue for the operation. Any insinuation that I said otherwise is in error, and a fabrication of what I said. When he informed me that he could not continue to assist me, I decided to file for the Tipton channel with the information I had obtained and decide later as to whether I needed to hire another engineer.
10. Let me be clear to the FCC, and to Mr. Garey, I petitioned the Commission to place channel 249C2 at Tipton because the first channel choice was not available. I stated that if 249C2 were placed there, I would file an application for it. I am still very much interested in this channel and will file an application for the FM facility on channel 249C2. I do not understand all of the concerns Texas Grace has concerning this channel when, according to the Rules, I could not state a site preference for the Tipton channel, and I had to protect KRZB when I filed the Tipton request or the FCC would have returned it as unacceptable.
11. Although Reynolds started out as my engineer on the Tipton petition, he informed me that he had to stop because he had a conflict and could not continue because of another client. Reynolds was not a part of GGR then,

now or do I have plans to create a position for him in the future. He provided engineering services only.

12. I would like to reiterate that my main concern is to have channel 249C2 allocated to Tipton as a commercial channel in order to provide my planned programming to the listeners of the area.

I respectfully request that the Commission accept these comments and that channel 249C2, a commercial channel, be placed at Tipton.

CERTIFICATION

I hereby affirm that the statements contained herein are true, complete and correct to the best of my knowledge and belief and are made in good faith.

Ellinor Nelson

Ellinor Nelson
GOOD GOVERNMENT RADIO
Post Office Box 478
Gonzalez, Florida 32560

CERTIFICATE OF SERVICE

I, Ellinor Nelson of Good Government Radio do hereby certify that I have on this 10th day of June, 1999 caused to be mailed by first class mail, postage prepaid, copies of the "Opposition to essential supplemental comments of Texas Grace Communications" to the following:

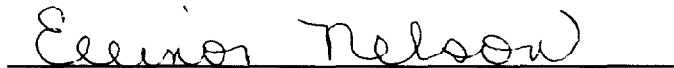
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